

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

KEZIAH PRINCE,

Plaintiff,

v.

STERLING BRIDGE LLC,

Defendant.

MISC NO. SX-11- MC-23

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT

COMES NOW Plaintiff by and through undersigned counsel, and files this Complaint against Defendant and alleges the following:

1. This Court has jurisdiction of the subject matter pursuant to 4 V.I.C. § 76.
2. Plaintiff, Keziah Prince is a citizen of St Croix, U.S. Virgin Islands
3. Defendant Sterling Bridge LLC is a limited liability Corporation with its principle place of business in Illinois and incorporated in Illinois but which does business in the U.S. Virgin Islands.
4. Defendant is an environmental company that did work at the Divi Carino Bay hotel on or about January 26, 2011.
5. Defendant negligently engaged in Mold eradication without warning the Plaintiff.
6. Defendant negligently informed the plaintiff that she could be in the area of the eradication while it was ongoing.
7. Defendant improperly exposed Plaintiff to chlorine dioxide and other chemicals.
8. As a direct and proximate result the Plaintiff suffered damage to her respiratory

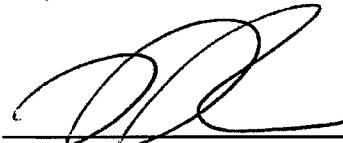
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system, physical and psychological injuries, medical expenses, loss of income, loss of capacity to earn income, mental anguish and loss of enjoyment of life, all of which are expected to continue into the foreseeable future.

9. The Defendant knew or should have known that its actions exposed Plaintiff to an unreasonable risk of injury but exposed her to the dangerous chemicals in reckless disregard of her rights and interests.

WHEREFORE, Plaintiff prays for damages as they may appear compensatory and punitive, costs and fees, pre and post judgment interest and such other relief as this Court deems fair and just.

RESPECTFULLY SUBMITTED
LAW OFFICES OF ROHN AND CARPENTER, LLC
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